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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 DANIEL AYALA-MORA,

16 Defendant.

No. CR 15-499-JAK

STIPULATION RE: PROTECTIVE ORDER

[PROPOSED ORDER LODGED
CONCURRENTLY HEREWITH]

NO HEARING REQUIRED

17
18 1. Plaintiff United States of America, by and through its
19 counsel of record, the United States Attorney for the Central
20 District of California and Assistant United States Attorney Ranee A.
21 Katzenstein, and defendant DANIEL AYALA-MORA, individually and by and
22 through his counsel of record, Angel Navarro, Esq., hereby stipulate
23 that:

24 a. The evidence in this matter includes personal
25 identification information for others, including but not limited to
26 names, addresses, dates of birth, social security numbers, and bank
27 account numbers (collectively "personal information").
28

1 b. This personal information is found throughout the
2 discovery to be produced in this case. Among other records, this
3 discovery includes records from the California Employment Development
4 Department ("EDD") and records from multiple bank accounts.
5 Government counsel estimates that the EDD records comprise over
6 10,000 pages and the bank records comprise over 5,000 pages.
7 Additional discovery – including post office box applications,
8 records seized during the execution of search warrants, and criminal
9 history reports – also includes personal information for others.

10 2. The parties stipulate, and request the Court to order, that
11 only defense counsel, defense counsel's agents, and defendant may
12 review the unredacted personal information contained in the discovery
13 in preparation for trial and sentencing, and that defense counsel,
14 defense counsel's agents and defendant may only use the unredacted
15 personal information or any portion thereof for the specific purpose
16 of preparing or presenting a defense in this matter (including
17 sentencing) and for no other purpose.

18 3. The parties further stipulate, and request the Court to
19 order, that only defense counsel and defense counsel's agents may
20 make copies of any discovery containing unredacted personal
21 information, and that defendant may make copies for his own use only,
22 which are not to be released to any third party, of any discovery
23 containing unredacted personal information that has been provided to
24 him by defense counsel or defense counsel's agents.

25 4. The parties further stipulate, and request the Court to
26 make its Order applicable to unredacted personal information
27 contained in all of the discovery to be produced in this case,
28 including any discovery produced after entry of its Order.

1 5. At the conclusion of this matter, defense counsel will
2 collect and destroy any and all copies of documents and portions
3 thereof containing the personal information that defense counsel
4 possesses and/or has made and distributed to his agents and/or
5 defendant, and any and all copies of documents and portions thereof
6 containing the personal information that defendant possesses, for the
7 purpose of preparing or presenting a defense in this matter, except a
8 copy set as necessary to maintain in defense counsel's case file.

9 IT IS SO STIPULATED.

10 Respectfully submitted,

11 EILEEN M. DECKER
12 Acting United States Attorney

13 LAWRENCE S. MIDDLETON
14 Assistant United States Attorney
 Chief, Criminal Division

15 Dated:

 /s/

 RANEE A. KATZENSTEIN
 Assistant United States Attorney

17 Attorneys for Plaintiff
18 UNITED STATES OF AMERICA

21 Dated:

 ANGEL NAVARRO, ESQ.

22 Attorney for defendant
23 DANIEL AYALA-MORA

26 Dated:

 DANIEL AYALA-MORA
27 Defendant

5. At the conclusion of this matter, defense counsel will collect and destroy any and all copies of documents and portions thereof containing the personal information that defense counsel possesses and/or has made and distributed to his agents and/or defendant, and any and all copies of documents and portions thereof containing the personal information that defendant possesses, for the purpose of preparing or presenting a defense in this matter, except a copy set as necessary to maintain in defense counsel's case file.

IT IS SO STIPULATED.

Respectfully submitted,

EILEEN M. DECKER
Acting United States Attorney

LAWRENCE S. MIDDLETON
Assistant United States Attorney
Chief, Criminal Division

Dated:


/s/

RANEE A. KATZENSTEIN
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated:

10/1/15



ANGEL NAVARRO, ESQ.

Attorney for defendant
DANIEL AYALA-MORA

Dated:

09/29/15



DANIEL AYALA-MORA
Defendant